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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et*
al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF FRANCISCO VELEZ
IN SUPPORT OF PLAINTIFFS' MOTION
FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

DECLARATION OF FRANCISCO VELEZ

I, FRANCISCO VELEZ, declare:

1. I am a resident of the City of Chicago in the State of Illinois. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I currently serve as the Acting Executive Director of Chicago's Office of Emergency Management and Communications ("OEMC"). I have held this position since February 2025. Before my appointment as Acting Executive Director, I served as a Deputy District Chief in the role as Coordinator of Special Events Liaison with the Chicago Fire Department.

3. As Acting Executive Director of OEMC, I make strategic decisions, in collaboration with the Mayor's Office and stakeholders across the City, to manage community safety for 3 million Chicago residents, including by planning and executing large-scale public events, as well as by coordinating the City's emergency response efforts. I serve as a liaison and subject matter expert on all related policy matters, and use of authorities and resources to promote and protect public safety and communications. I currently manage an executive team of 9, a budget of \$97M, and approximately 800 employees, with a dedication to sustaining a strong public safety infrastructure.

4. Collaboration with State and Federal partners is an essential element of OEMC's public safety operations. The proposed reorganization of the Federal government threatens the continuity of OEMC's public safety coordination services in several ways. I will focus on two specific threats here.

Harms Related to Reorganization of U.S. Department of Commerce

5. Chicago hosts multiple large-scale outdoor events each year, including the NASCAR Chicago street race, as well as multiple music festivals, such as Lollapalooza, Sueños, and Riot Fest.

6. To ensure the safety of festival-goers, performers, and staff, OEMC relies on the National Weather Service ("NWS"), a component of the National Oceanic and Atmospheric Administration, for its data and expertise in order to monitor weather patterns and make contingency plans in the event of adverse weather.

7. Unlike private weather services, which typically provide weather updates for an entire city or regional area, NWS data is precise enough to predict weather events within a narrow geographic range, and OEMC relies on NWS data to predict whether and how adverse weather events will affect the specific geographic area in which the large-scale event is occurring.

8. Further, during many large-scale events like those listed above, an employee of NWS works on-site with the OEMC Command Center to provide real-time weather updates and support. This crucial support has enabled Chicago OEMC to rapidly detect and respond to unpredictable weather patterns during large-scale outdoor events, thereby allowing event staff to adapt and modify event plans in real time while still protecting the safety of Chicagoans.

9. For example, NWS provided key support in responding to the torrential rainstorms during the NASCAR Chicago street race during both the 2023 and 2024 years.¹

10. If the proposed reduction or elimination of the Department of Commerce's National Oceanic and Atmospheric Administration, of which NWS is a part, is allowed to occur, OEMC will lose NWS's crucial on-site support, which is a key element of the City's emergency preparedness efforts during large-scale outdoor events.

11. Additionally, OEMC lacks the capacity to collect weather data and conduct in-house weather prediction analysis at the level of precision and sophistication that NWS provides, so if NWS's weather monitoring and prediction efforts are eliminated or substantially reduced, the City will be forced to instead rely on less-accurate private weather services to prepare for adverse weather conditions or issue weather alerts.

Harms Related to Reorganization of U.S. Department of Homeland Security

12. OEMC collaborates with both the Illinois Emergency Management Agency ("IEMA") and the Federal Emergency Management Agency ("FEMA") to respond to natural disasters within Chicago.

13. Chicago has endured three natural disasters that rise to the level of a federal Major

¹ <https://blockclubchicago.org/2024/07/07/nascar-chicago-street-race-begins-late-sunday-after-rain-delay/>

1 Disaster Declaration within the past two years: twice due to extreme flooding, and once due to
2 damage caused by multiple tornados. A Major Disaster Declaration frees up federal money and
3 resources to assist residents repair and rebuild damaged homes, obtain temporary shelter, and
4 address other disaster-related needs.

5 14. After the President signs a federal Major Disaster Declaration, FEMA and IEMA
6 both provide critical staffing support to OEMC, in two ways. First, FEMA, in collaboration with
7 IEMA, establishes Disaster Relief Centers, where residents in need of aid can obtain disaster-related
8 shelter and support. Second, FEMA provides additional staffing to knock on doors in underserved
9 areas, such as areas with an increased number of elderly or disabled residents who may not be
10 physically able to leave their homes and travel to the nearest Disaster Relief Center for assistance.

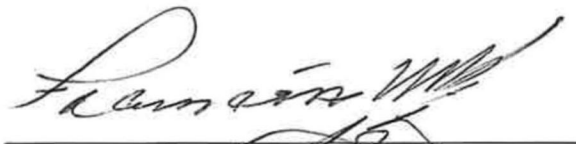
11 15. OEMC lacks the staffing capacity to create multiple Disaster Relief Centers and
12 cannot supply sufficient personnel to knock on doors in all underserved areas of Chicago. It is my
13 understanding that IEMA can continue to provide some support to OEMC during natural disasters
14 but also lacks the capacity to fill the gap if FEMA were to be absent during a major disaster.

15 16. One very important component of DHS is FEMA. Thus far, however, we have only
16 rumors about the nature of the RIFs that target FEMA.

17 17. If FEMA's proposed elimination or significant reduction in force is allowed to
18 proceed, OEMC will be unable to fill the gap left by FEMA's absence during major disasters.
19 Without FEMA's "boots on the ground," doors will go unknocked, and vulnerable individuals who
20 are entitled to federal, state and local disaster relief and support will not be contacted.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct.

23 Executed on April 29, 2025, in Chicago, Illinois.

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25
26 
Francisco Velez, Acting Executive Director